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9	UNITED STATES DISTRICT COURT	
10	DISTRICT OF NEVADA	
11	Terry Washington,	Case No. 2:17-cv-01906-JCM-VCF
12	Plaintiff,	MOTION FOR EXTENSION TO FILE STIPULATION OF DISMISSAL
13	vs.	
14	Dwight Neven, et al.,	(FIRST REQUEST)
15	Defendants.	
16	Defendants, by and through counsel, Adam Paul Laxalt, Attorney General, and	
17	Henry H. Kim, Deputy Attorney General, of the State of Nevada, Office of the Attorney	
18	General, hereby move for a first extension to file Stipulation of Dismissal. This motion is	
19	made and based on the points and authorities herein as well as the pleadings and papers	
20	on file with the Court.	
21	MEMORANDUM OF POINTS AND AUTHORITIES	
22	I. NATURE OF THE MOTION	
23	Defendants hereby move for an enlargement of time of the currently scheduled	
24	submittal of proposed order of dismissal to the Court.	
25	II. STATEMENT OF THE CASE	
26	On June 18, 2018, the Court issued its Screening Order stating that it had conducted	
27	its screening pursuant to 28 U.S.C. § 1915A, and that certain specified claims in this case	
28	would proceed. ECF No. 5. The Court ordered the Office of the Attorney General of the	

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State of Nevada to file a report ninety (90) days after the date of the entry of the Court's Screening Order to indicate the status of the case at the end of the 90-day stay. *Id.* at 14. On October 12, 2018, the parties participated in an EMC and reached a settlement. ECF No. 12. The Court's deadline to file settlement documents is November 13, 2018. *Id.*

III. DISCUSSION

The Court may, for good cause, extend the time in which an act must be done if a request is made before the original time or its extension expires. FED. R. CIV. P. 6(b)(1)(A).

Defendants hereby request an extension of a period of thirty (30) days to allow the parties to memorialize the settlement terms in a settlement agreement and to execute and file a stipulation and order for dismissal of the case. Defendants' Counsel needs and requests additional time to submit settlement documents to Plaintiff, who is a pro se litigant housed in the Nevada Department of Corrections. Defendants submit that the facts and argument contained herein constitute good cause to enlarge the time to submit a stipulation for dismissal.

IV. CONCLUSION

Based upon the foregoing, Defendants hereby request an extension to submit a stipulation for dismissal.

DATED this 13th day of November, 2018.

Respectfully submitted,

IT IS HEREBY ORDERED that settlement documents must be filed on or before December 14, 2018.

Respectfully submitted,

ADAM PAUL LAXALT Attorney General

By: <u>/s/ Simba Muzorewa</u>
Simba Muzorewa (Bar No. 14097)
Deputy Attorney General
On behalf of:
Henry H. Kim (Bar No. 14390)
Deputy Attorney General

Attorneys for Defendants

UNITED STATES MAGISTRATE JUDGE DATED: __11-15-2018__

IT IS SO OF DERED.

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on November 13, 2018, I electronically filed the foregoing MOTION FOR EXTENSION TO FILE STIPULATION OF DISMISSAL, via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada to the following:

Terry Washington #1150546 Lovelock Correctional Center 1200 Prison Road Lovelock, NV 89419 Plaintiff, Pro Se

<u>/s/ Diane Resch</u>

Diane Resch, an employee of the Office of the Nevada Attorney General